

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of Parts 2 and 15 of the Commission's)	ET Docket No. 03-122
Rules to Permit Unlicensed National Information)	RM - 10371
Infrastructure (U-NII) devices in the 5 GHz band)	
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)	

**COMMENTS OF
AIRRUNNER TECHNOLOGIES INC.**

Introduction

Airrunner Technologies Inc. (Airrunner) submits these Comments in support of the Commission's NOTICE OF PROPOSED RULEMAKING, adopted May 15, 2003 and released June 4, 2003.

Discussion

Airrunner, a designer and manufacturer of wireless communications equipment, agrees with the Commission that the spectrum currently available for U-NII devices is insufficient to support long-term growth for unlicensed wireless broadband devices and networks.

However, not only is there a requirement for more spectrum to serve more subscribers, but there is a growing need to provide subscribers with higher speed services. These higher speed services require the use of more of the available bandwidth and/or the use of multi-state modulation techniques.

Because wider bandwidths/higher modulation states lowers a receiver's sensitivity, higher power will be required for these systems to meet the necessary quality of service (QOS) standards. Therefore, Airrunner agrees with Lincom, WCA, Air2LAN and Airband that there is a pressing need for more power than presently allowed under the rules for U-NII equipment.

Conclusion

Airrunner supports the proposed amendment to Part 15 of the rules to make available an additional 225 megahertz of spectrum in the 5.47-5.725 GHz band and requests the application of the requirements of the 5.725-5.825 MHz, ISM band to the new spectrum.

Respectfully submitted,

AIRRUNNER INC.

Greg. W. Phillips
C.E.O.